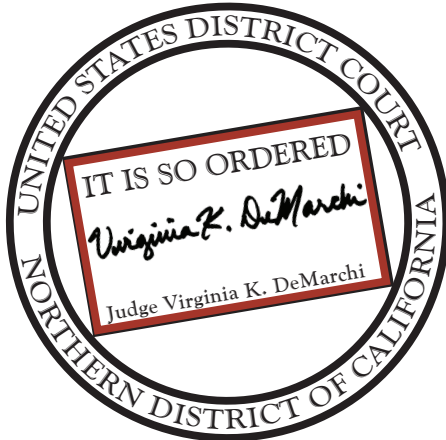


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*Attorneys for E.H. and C.S., on behalf of
 themselves and all others similarly situated*

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

*E.H. and C.S., on behalf of themselves and all
 others similarly situated,*

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-4784-WHO (VKD)
 ORDER GRANTING
**FURTHER JOINT STATEMENT
 REGARDING CASE SCHEDULE**

Re: Dkt. No. 133

In its April 23, 2025 Order Re Discovery Schedule, this Court noted that the parties' April 14, 2025 scheduling proposal "[did] not appear to comply with the case management schedule entered by the presiding judge, which sets the close of fact discovery on September 11, 2025." ECF 116. The Court thus instructed the parties to "re-file a proposed ESI production schedule that complies with the September 11, 2025 fact discovery deadline" by April 29, 2025. *Id.*

On April 29, 2025, the parties submitted a Joint Statement Regarding Case Schedule indicating that they were negotiating a proposed extension of the case schedule, including an extension of the September 15, 2025 fact discovery deadline, and requesting that they be permitted to re-file a proposed discovery schedule to the Court after the new case schedule was set. ECF 125. On April 30, 2025, the Court granted the parties' request, and instructed the parties to "file their proposed discovery schedule no later than 7 days after the presiding judge acts on their anticipated request to extend the case schedule." ECF 126.

On May 6, 2026, the parties submitted a stipulation and proposed order extending the case schedule, ECF 127, which was entered by Judge Orrick on May 8, 2025, ECF 128. Among other things, the revised case schedule sets the close of fact discovery for March 26, 2026. *See* ECF 128 at 3.

In light of the foregoing, the parties submit the following discovery schedule. The parties have noted, for reference, any discovery-related deadlines that have already been entered by Judge Orrick pursuant to ECF 128. Deadlines in bold are additional proposed discovery deadlines which have not yet been entered.

Event	Proposed or Entered Deadline
Deadline for substantial completion of Meta's production of documents from the <i>Healthcare</i> case	May 21, 2025 (ECF 128)
Deadline for Meta to begin rolling production of final deposition transcripts (for depositions of Meta witnesses) from the <i>Healthcare</i> case ¹	May 21, 2025
Deadline for substantial completion of Meta's production of data from the <i>Healthcare</i> case	June 6, 2025 (ECF 128)

¹ Meta reserves its right to challenge the production of individual transcripts in accordance with Judge Orrick's guidance at the April 22, 2025 Case Management Conference. If Meta does challenge the production of any transcripts, Meta will notify plaintiffs within one week of the transcript being finalized, so that the parties can meet and confer accordingly. The notification shall include the full factual basis necessary to evaluate Meta's objection.

Event	Proposed or Entered Deadline
Deadline for plaintiffs to respond to Meta's First Set of Requests for Production, dated April 4, 2025 ("Meta's First Set of RFPs")	June 6, 2025
Deadline for plaintiffs to disclose ESI data sources applicable to Meta's First Set of RFPs	June 6, 2025
Deadline for substantial completion of Meta's production of documents produced by any applicable third parties in the <i>Healthcare</i> case	June 16, 2025 (ECF 128)
Deadline for substantial completion of Meta's production of final deposition transcripts (for depositions of Meta witnesses) from the <i>Healthcare</i> case ²	June 16, 2025
Deadline for plaintiffs to disclose search terms and hit reports, as applicable, for Meta's First Set of RFPs	July 28, 2025
Deadline for Meta to respond to plaintiffs' proposed search terms, as applicable, for Meta's First Set of RFPs	August 4, 2025 (unless the parties agree otherwise)
Deadline for plaintiffs to serve any supplemental discovery requests following their review of the <i>Healthcare</i> production	August 11, 2025 (ECF 128)
Deadline for the parties to meet and confer regarding disputes, if any, concerning the search terms, as applicable, for Meta's First Set of RFPs	August 12, 2025 (unless the parties agree otherwise)
Deadline for Meta to disclose additional custodians and/or ESI data sources, if any, applicable to any supplemental discovery requests to Meta	September 10, 2025
Deadline for the parties to reach agreement/conclude negotiations regarding the scope of any supplemental discovery requests to Meta	September 24, 2025
Deadline for Meta to disclose search terms and hit reports, as applicable, for any supplemental discovery requests to Meta	October 22, 2025
Deadline for plaintiffs to respond to Meta's proposed search terms applicable to any supplemental discovery requests to Meta	October 27, 2025 (unless the parties agree otherwise)
Deadline for the parties to meet and confer regarding disputes, if any, concerning the search terms applicable to any supplemental discovery requests to Meta	October 31, 2025 (unless the parties agree otherwise)
Deadline for completion of plaintiffs' document productions in response to Meta's First Set of RFPs	December 6, 2025 (ECF 128)
Deadline for completion of document productions in response to any supplemental discovery requests by either party	February 2, 2026 (ECF 128)

² Depositions in the *Healthcare* case remain ongoing. Consequently, not all final deposition transcripts will be available by the proposed June 16, 2025 deadline. Therefore, deposition transcripts that are finalized after June 16, 2025 will be produced two weeks after they are finalized, unless the parties agree to extend the deadline for a particular deposition.

Event	Proposed or Entered Deadline
Completion of Fact Discovery	March 16, 2026 (ECF 128)
Close of Expert Discovery	December 22, 2026 (ECF 128)

Dated: May 15, 2025

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Lauren Goldman

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Dated: May 15, 2025

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CIVIL L.R. 5-1(i)(3) ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I, Lauren Goldman, hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.

Dated: May 15, 2025

By: /s/ Lauren Goldman